

From: Duchnak, Laura S CIV USN COMNAVFACENGCOM DC (USA)
To: Manzanilla, Enrique
Cc: lawrence.lansdale@navy.mil; Herrera, Angeles; Chesnutt, John; Praskins, Wayne; Sanchez, Yolanda; Yogi, David; Ostrowski, Kimberly A CIV USN COMNAVFACENGCOM DC (USA); Macchiarella, Thomas L CIV USN COMNAVFACENGCOM DC (USA); Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA); Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA); Wochnick, Heather M CIV USN (USA)
Subject: RE: HPNS building RGs
Date: Wednesday, September 1, 2021 2:03:55 PM
Attachments: RE HPNS building RGs.pdf

Enrique,

Thank you for your email. The Navy's proposal was sent to Wayne by Paul Stoick on 20 August and then discussed with EPA staff the following week. Generally, the EPA was requesting that Navy data be able to verify the "removable fraction" and "contaminated areas" remaining after remediation are appropriate to indicate protectiveness. Paul's email specified that the current work plan approach is effective in satisfying EPA's needs to prove certain assumptions. The email also referred to the specific Tables in the work plan which show the planned minimum detectable concentrations (MDCs). The follow-on discussion was intended to draw from EPA whether the planned MDCs were in fact suitable for EPA, or if EPA has different MDCs to be met. The email with the proposal is attached. I have asked the team to clarify that this the proposal and ensure all the regulatory agencies have received it.

I want to reinforce that the Navy went to great lengths to use defensible inputs in our risk assessment. We modified the default RESRAD inputs to be consistent with the EPA Exposure Factor Handbook values and certain default values from the BPRG calculator for our evaluation. The Navy's assessment confirmed that the current RGs are protective. The Navy has also consulted with RASO and other experts to ensure that the data collected is sufficient to meet our protectiveness standards. This means that future work should verify that the RGs have been met to show protectiveness.

Again, the Navy is open to further discussion on these topics. If EPA needs other information than what is planned in our work plan, such as different MDCs, please convey the levels and rationale as soon as possible and we will be happy to discuss.

Thank you for sharing the information regarding the recent listening session. The cleanup levels and process being applied at Hunters Point are driving a cleanup that is lower than any other successful radiological cleanup that BRAC Staff, RASO, or our radiological contractors are aware of. The current project is retesting past cleanup work to levels that far exceed what is defined by MARSSIM guidance. We appreciate your continued efforts to move retesting forward to allow for productive reuse of property at HPNS and I look forward to our next DRC level discussion.

Regards,

Laura
